

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Kathy Barnette, *et al.*,

Plaintiffs,

v.

Kenneth E. Lawrence Jr., Chair of the Montgomery County Board of Elections and Vice Chair of the Montgomery County Board of Commissioners, in his official capacity, *et al.*,

Defendants.

No. 20-cv-5477

Judge Petrese B. Tucker

PROPOSED INTERVENOR-DEFENDANT'S MOTION TO INTERVENE

Proposed Intervenor-Defendant Democratic Services Corporation/Democratic National Committee (the “DNC”) moves for leave to participate in this action to defend its interests against the claims asserted by Plaintiffs. For the reasons discussed in the memorandum in support, Proposed Intervenor is entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative, Proposed Intervenor requests permissive intervention pursuant to Rule 24(b). In accordance with Rule 24(c), a proposed answer to Plaintiffs’ complaint is attached as Exhibit A.

WHEREFORE, Proposed Intervenor requests that the court grant it leave to intervene in the above-captioned matter.

Dated: November 3, 2020.

Respectfully submitted,

/s/ Edward Rogers

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Counsel for Proposed Intervenor

**Motions for Admission Pro Hac Vice
Forthcoming*

CERTIFICATE OF SERVICE

I hereby certify that on Tuesday, November 3, 2020, on I filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ *Edward Rogers*

Counsel for Proposed Intervenor